

Thank you for the opportunity to comment on the water sharing plan for the Gwydir regulated river water source 2016 .

By the very name ' The water sharing plan' it is taken to mean how water is shared between various water users, there is nothing in there for "water takers " which is what the Gingham and lower Gwydir landholders (in the unregulated Gwydir) seem to be these days , whilst the environment is now legally recognised as a water user of a regulated system ,there is nothing in the plan that truly encompasses what the private landholders on the unregulated Gwydir provide for society in this return of water to a very changed landscape caused by government over regulation and the subsequent drying of the wetlands, from modelled data the Gwydir is shown to be one of the most flow altered rivers in Australia .

Since the first water sharing plan in 2004 , there has been an enormous policy change regarding environmental water management , firstly being through large volumes of water buy backs held in Copeton (HEW) secondly the acquisition of a large area of land that is now called the 'state conservation area (National parks) this coupled with planned environmental water (PEW) and associated management for long term environmental outcomes needed for the basin plan ,and upholding of international intergovernmental agreements such as the Ramsar convention and various migratory birds agreements such as JAMBA and CAMBA has increasingly affected private landholders by third party inundation since 2007 , yet there has been little change in the WSP , other than the flow volume being changed from 500,000 mg/l over six months at Yarraman bridge gage in very wet periods to 300,000mg/l to allow flow to be directed away from the wetlands for a specified time , at the moment in the wsp this is the lesser of 6 months or 31st August . In the 21st century it is incredible to think that we are guided by the flow volume under a bridge, with the technology now available it should be monitored and managed according to "the state of the wetlands" all of this policy is archaic and goes back to a time in the 1980's -1990's when watercourse graziers were trying unsuccessfully to regain some of the water that had been over allocated.

There needs to be recognition and more flexible water management included in the wsp, that acknowledges the changed landscape to predominately broadacre cropping enterprises, with a clause to cover accountability for third party inundation of cropping country. The proposed reconnecting water course programme delivered under the northern basin toolkit, does not deal with water policy and the mismanagement of water under the guise of environmental outcomes, this has caused huge economic loss to private landholders since 2007, with no accountability from water managers .

Better clarification on environmental water managers wal operating requirements of the water purchased in the buy backs needs to be included, do oeh and cewh operate under the same requirements as an irrigator? if so where is the accountability for environmental water mismanagement? an irrigator under wal is not allowed to inundate their neighbours, yet this occurs to private landholders on a regular basis, especially in times of bird breeding events.

A clause for a monthly update of releases of state and cewh deliveries both HEW and PEW to be provided by water NSW and to be publicly available needs to be included in the wsp

Title of National parks will be transferred to first nations within the next few decades , yet there is no provision for this transfer of ownership in the wsp , there has already been much work done through various government depts on the seasonal Calander and cultural flows allocations (hence another legally recognised water user) to be included in the basin plan , yet the private landholders who facilitate the passage of this water and the associated problems that may occur

through off target inundation are not included , this in itself is a huge lack of transparency ,surely better social ,cultural and economic outcomes would be achieved by including us all in the conversation inclusion means amendments to the wsp framework that includes us all !!

The Gwydir WRP remains unaccredited, in part due to the short comings in including the needs of the First nations that is needed to fully implement the basin plan, it would show no duty of care if provision for what private landholders provide in facilitating environmental outcomes of the basin plan were not included adequately in this new WRP , this necessitates amendments to the wsp to reflect same, one being the legal framework for the other

The EWAG is included in the wsp, it is not a 'fit for purpose advisory group' ,but merely a tick and flick to meet a legislated requirement of the wsp , private landholders on the unregulated Gwydir are the largest stakeholders ,facilitating environmental outcomes , yet have token representation , and when making comment on environmental water management that concerns the landholders they represent it is most often construed as lobbying ,and they are read the terms of reference , but the point they are trying to make is that they are also part of this newly recognised environment society now deems fit to see and need to be included in the outcomes !! Landholder engagement with both state and commonwealth environmental water depts is at an all-time low, with access to majority of private land prohibited.

Major amendments needed in the wsp around the ewag , its role, membership and transparency, this includes emailing minutes of meeting to all landholders, and updating the terms of reference .